

## **REMARKS**

### **Status of the Claims**

- Claims 1, 3-8, and 10-15 are pending in the Application after entry of this amendment.
- Claims 1-15 are rejected by the Examiner.
- Claims 1, 8, and 13 are amended by the Applicant.
- Claim 2 and 9 are cancelled by the Applicant.

### **Claim Rejections Pursuant to 35 U.S.C. §103**

Claims 1-6, 8-13, and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2002/047008 to Kallio in view of U.S. Patent No. 6,256,498 to Ludwig and in further view of U.S. Patent Publication No. 2002/0177431 to Hamilton et al. (Hamilton). Applicant respectfully traverses the rejection via amendment.

Independent Claims 1, 8, and 13 are amended to include the aspects that the interworking function is part of the WLAN and uses a Gp interface. Support for this amendment is provided in Figure 1 which depicts the interworking function 25 as part of the WLAN and in now cancelled Claims 2 and 9 which refer to the Gp interface of the interworking function.

Kallio in Figure 1 depicts an A-Interface Gateway (AGW) interface to the hotspot LAN 230. The AWG 310 is under the control of the Network Management System 300. See Kallio para. 0028. Kallio discusses how a connection can be made from a WLAN 200 to a GSM network 100 via a hotspot LAN 230 using the A-Interface Gate (AWG) 310 under the control of a Network Management System 300. However, Kallio discusses the more common A-Interfaces but does not teach or suggest use of Gp interfaces in a WLAN connection. Kallio is also silent concerning the use an interworking

function, that is part of the WLAN, that enables a WLAN to appear as another PLMN, and communicates with a Serving General Packet Radio Service Support Node (SGSN) of a selected PLMN using a Gp interface. Kallio simply does not teach or suggest the aspects of an interworking function within a WLAN that enables the WLAN to appear as a PLMN in order to communicate to a SGSN using a Gp interface.

Ludwig does discuss the use of Gp interfaces as an interconnection between two individual PLMN configurations. But Ludwig is silent concerning connections between PLMNs and WLANs. Since Ludwig does not teach or suggest WLANs, then naturally, one of skill in the art would conclude that Ludwig does not teach or suggest the use an interworking function, that is part of a WLAN, that enables a WLAN to appear as another PLMN, where the interworking function in the WLAN communicates with a Serving General Packet Radio Service Support Node (SGSN) of a selected PLMN using a Gp interface. Ludwig simply does not teach or suggest the aspects of an interworking function in a WLAN that enables the WLAN to appear as a PLMN in order to communicate to a SGSN using a Gp interface.

Hamilton at paragraph 0040 discusses how Border Gateways (BG) are useful to provide a secure connection over an inter-PLMN backbone network for packet switched data. Hamilton indicates that the BG 36 appears as an IP router if the inter-PLMN network is an IP network. Figure 1 of Hamilton depicts a connection between a PLMN and a GPRS Backbone Network (GBN) 38 via a Border Gateway (BG) 36. However, Hamilton is silent concerning the use an interworking function, that is part of a WLAN, that enables a WLAN to appear as another PLMN, where the interworking function of the WLAN communicates with a Serving General Packet Radio Service Support Node (SGSN) of a selected PLMN using a Gp interface. Thus, one of skill in the art would not conclude that Hamilton teaches or suggests that an interworking function, that is part of a WLAN, can enable a WLAN to appear as another PLMN, where the

interworking function in the WLAN communicates with a SGSN of a selected PLMN using a Gp interface.

Since the cited combination of Kallio, Ludwig, and Hamilton does not teach or suggest the claimed combined aspects of an interworking function, that is part of a WLAN, that enables the WLAN to appear as another PLMN to a selected PLMN, and that the WLAN interworking function serves to connect to a SGSN using a Gp interface as recited in the pending claims, then the pending claims are patentably distinct from the cited art.

Also, Applicant respectfully submits that there is no motivation to one of skill in the art to combine the cited references because Kallio only discusses A-interfaces with WLANs. Kallio does not discuss using Gp interfaces. Ludwig discusses only PLMN to PLMN connections using Gp interfaces, yet completely fails to discuss WLANs at all. Hamilton also fails to discuss the use of Gp interfaces to a WLAN. Hamilton discusses Border Gateway interfaces to PLMNs but does not discuss an interworking function, that is part of a WLAN, that enables a WLAN to appear as another PLMN. With all of the above noted diversions of teachings, Applicant respectfully suggests that one of skill in the art would not be motivated to combine the separate teachings of Kallio, Ludwig, and Hamilton because the combination does not teach or suggest an interworking function in a WLAN that enables the WLAN to appear as a PLMN in order to communicate between a WLAN and a PLMN using a Gp interface as recited in the pending claims.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. §103 rejection of pending Claims 1-6, 8-13, and 15 because these amended claims patentably define over the cited art.

Claims 7 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2002/047008 to Kallio in view of

U.S. Patent No. 6,256,498 to Ludwig, and in further view of U.S. Patent Publication No. 2002/0177431 to Hamilton et al. (Hamilton), and in further view of U.S. Patent No. 6,212,390 to Rune. Applicant respectfully traverses the rejection.

The combined teachings of Kallio, Ludwig, and Hamilton are discussed above.

Rune discusses dividing up a cellular mobile communications system into general geographic areas having geographic coordinates. However, like Kallio, Ludwig, and Hamilton, Rune also fails to teach or suggest that an interworking function in a WLAN can enable the WLAN to appear as a PLMN in order to communicate between a WLAN and a PLMN using a Gp interface as recited in amended independent Claims 1 and 13 upon which Claims 7 and 14 depend respectively. Since independent Claims 1 and 13 are patentably distinct over the cited art, then dependent Claims 7 and 14 are likewise patentably distinct over the cited art per MPEP §2143.03. Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. §103 rejection of pending Claims 7 and 14.

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### **Conclusion**

Applicant respectfully submits that the amended pending claims patentably define over the cited art and respectfully requests reconsideration and withdrawal of all rejections of the pending claims. Applicant respectfully solicits reconsideration for a Notice of Allowance for all pending claims.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 07-0832 therefore.

Respectfully submitted,  
Shaily Verma et al.

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